



SIDLEY AUSTIN LLP
555 CALIFORNIA STREET
SUITE 2000
SAN FRANCISCO, CA 94104
+1 415 772 1200
+1 415 772 7400 FAX

sbrody@sidley.com
+1 415 772 1279

BEIJING	HONG KONG	SAN FRANCISCO
BOSTON	HOUSTON	SHANGHAI
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FOUNDED 1866

June 9, 2017

Via ECF

Hon. P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007-1312

Re: *In re: SunEdison, Inc., Securities Litigation*,
No. 1:16-md-02742-PKC

Dear Judge Castel:

We write on behalf of Defendants¹ regarding the motions to dismiss filed today in the following actions (collectively, the “Motions”): *Horowitz, et al. v. SunEdison, Inc., et al.*, 1:16-cv-07917-PKC, *Church v. Chatila, et al.*, 1:16-cv-07962-PKC, *In re Terraform Global, Inc. Securities Litig.*, 16-cv-07967-PKC; *Chamblee, et al. v. TerraForm Power, Inc. et al.*, 1:16-cv-08039-PKC

Defendants have coordinated to the fullest extent possible to ensure efficient discussion of the overlapping factual issues, legal standards, and legal arguments in the Motions. Certain of the briefs refer to or rely on discussions in other briefs on these shared points. Defendants therefore recommend that the Court read the Motions in the following order:

1. *Horowitz* Defendants’ Joint Motion To Dismiss Plaintiffs’ Claims Under Sections 11, 12(a)(2), And 15 Of The Securities Act Of 1933
2. *Horowitz* Exchange Act Defendants Motion to Dismiss Second Amended Consolidated Securities Class Action Complaint
3. *Horowitz* Defendant KPMG Motion to Dismiss Second Amended Consolidated Securities Class Action Complaint
4. *Church* Defendants’ Motion to Dismiss Second Amended Complaint

¹ Defendants are listed below in the signature blocks.



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5. *In re TerraForm Global, Inc.* Defendants' Motion to Dismiss the Consolidated Second Amended Class Action Complaint
6. *Chamblee* Defendants' Motion to Dismiss Second Amended Complaint

In connection with the Motions, Defendants have also filed the Omnibus Declaration of Jaime A. Bartlett In Support of Defendants' Motions. This Omnibus Declaration contains all of the exhibits cited by Defendants in the Motions in order to eliminate duplicative exhibits and further aid in the efficient review of the Motions.

Finally, pursuant to the Court's Individual Practices, subsection F, Defendants request oral argument on each of these motions.

Respectfully submitted,

By: /s/ Sara B. Brody

Sara B. Brody
SIDLEY AUSTIN LLP
555 California Street, Suite 2000
San Francisco, California 94104
Telephone: (415) 772-1200
Facsimile: (415) 772-7400
sbrody@sidley.com

Attorneys for Individual Defendants Antonio R. Alvarez, Jeremy Avenier, Ahmad Chatila, Clayton Daley, Jr., Emmanuel Hernandez, Georganne C. Proctor, Steven Tesoriere, Martin Truong, James B. Williams, Brian Wuebbels, and Randy H. Zwirn

By: /s/ Timothy Perla

Timothy Perla
Michael Bongiorno
WILMER CUTLER PICKERING
HALE AND DORR LLP
60 State Street
Boston, Massachusetts 02109
Telephone: (617) 526-6000
Facsimile: (617) 526-5000
Timothy.Perla@wilmerhale.com



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Michael.Bongiorno@wilmerhale.com

*Attorneys for Individual Defendant Peter
Blackmore, TerraForm Global, Inc., and
TerraForm Power, Inc.*

By: /s/ Adam S. Hakki
Adam S. Hakki
Daniel C. Lewis
Adam J. Goldstein
SHEARMAN & STERLING LLP
599 Lexington Avenue
New York, New York 10022-6069
Telephone: (212) 848-4000
Facsimile: (212) 848-4924
ahakki@shearman.com
daniel.lewis@shearman.com
adam.goldstein@shearman.com

Attorneys for the Underwriter Defendants

By: /s/ Charles Wm. McIntyre
Charles Wm. McIntyre (admitted *pro hac vice*)
Jessica E. Morrison (admitted *pro hac vice*)
MCGUIREWOODS LLP
2001 K Street, NW, Suite 400
Washington, DC 20006
Telephone: (202) 857-1700
Facsimile: (202) 857-2959
cmcintyre@mcguirewoods.com
jmorrison@mcguirewoods.com

Attorneys for KPMG LLP



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By: /s/ Daniel Bookin
Daniel Bookin
O'MELVENY & MYERS LLP
Two Embarcadero Center
28th Floor
San Francisco, CA 94111
Tel: (415) 984-8700
Fax: (414) 984-8701
dbookin@omm.com

Attorneys for Defendant Alejandro Hernandez

By: /s/ Kevin J. O'Connor
Kevin J. O'Connor (pro hac vice)
Victoria P. Lane (Bar No. 4141818)
Rhiannon A. Campbell (pro hac vice)
HINCKLEY ALLEN & SNYDER LLP
28 State Street
Boston, MA 02109
t: (617) 345-9000
f: (617) 345-9020
koconnor@hinckleyallen.com
vlane@hinckleyallen.com
rcampbell@hinckleyallen.com

*Attorneys for Defendants Carlos Domenech
Zornoza and Franciso Perez Gundin*

cc: All Counsel of Record (via ECF)